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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**STIPULATION TO MODIFY SCHEDULE
REGARDING MOTIONS FOR SUMMARY
JUDGMENT ON CLAIM OF AMIR
SHAHMIRZA**

[Related to Dkt. Nos. 12130, 13478, 13567]

1 PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors
2 (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases
3 (the “**Chapter 11 Cases**”), on the one hand, and Creditors Amir Shahmirza (Agent for Komir, Inc.) and
4 Komir, Inc. (together, “**Shahmirza**,” and, collectively with the Reorganized Debtors, the “**Parties**” and
5 each, a “**Party**”) on the other hand, by and through their respective counsel, hereby stipulate and agree
6 as follows:

7 **RECITALS**

8 A. On April 8, 2022, the Reorganized Debtors filed the *Reorganized Debtors’ Objection to*
9 *Proof of Claim No. 2090 Filed by Amir Shahmirza* (the “**Objection**”) [Docket No. 12130]. Concurrently
10 with the Objection, the Reorganized Debtors filed the *Notice of Hearing on Reorganized Debtors’*
11 *Objection to Proof of Claim No. 2090 Filed by Amir Shahmirza* [Docket No. 12132], which set a hearing
12 on the Objection for May 10, 2022.

13 B. On April 22, 2022, after the Parties conferred regarding continuing the hearing and
14 response deadline for Shahmirza, the Reorganized Debtors filed the *Notice of Continued Hearing on*
15 *Reorganized Debtors’ Objection to Proof of Claim No. 2090 Filed by Amir Shahmirza* [Docket
16 No. 12208], which continued the hearing on the Objection to July 12, 2022.

17 C. On June 28, 2022, Shahmirza filed the *Response and Points and Authorities in Opposition*
18 *to Objection to Claim #2090* [Docket No. 12572].

19 D. On July 1, 2022, the Parties entered into a stipulation [Docket No. 12585] to further
20 continue the hearing on the Objection to October 11, 2022, which was approved by an order entered on
21 July 6, 2022 [Docket No. 12594].

22 E. On October 4, 2022, the Reorganized Debtors filed the *Reply in Support of Reorganized*
23 *Debtors’ Objection to Proof of Claim No. 2090 Filed by Amir Shahmirza* [Docket No. 13045].

24 F. At the hearing on October 11, 2022, the Court held a status conference on the Objection.
25 The appearances for counsel for Shahmirza and the Reorganized Debtors were as noted on the record.

26 G. By docket text entry on October 11, 2022, the Court set December 8, 2022, as the deadline
27 for Shahmirza to file a motion for summary judgment (the “**Shahmirza Motion**”) and set a status
28 conference for December 13, 2022.

1 H. On November 22, 2022, the Parties entered into a stipulation [Docket No. 13280],
2 whereby the parties agreed to drop the December 13 status conference from the Court's calendar, and
3 further agreed to a briefing schedule on the Shahmirza Motion. The stipulation was approved by an
4 order entered on November 23, 2022 [Docket No. 13283]. A hearing on the Shahmirza Motion was
5 scheduled for March 7, 2023, at 10:00 a.m. (Pacific Time).

6 I. On December 28, 2022, the Parties entered into a stipulation [Docket No. 13392],
7 whereby the parties agreed to modify the briefing schedule on the Shahmirza Motion. The stipulation
8 was approved by an order entered on December 28, 2022 [Docket No. 13395]. The hearing on the
9 Shahmirza Motion and any counter-motion by the Reorganized Debtors was moved to April 11, 2023 at
10 10:00 a.m. (Pacific Time).

11 J. On January 31, 2023, Shahmirza filed the Shahmirza Motion. *See* Docket No. 13478
12 (*Notice of Motion and Motion for Partial Summary Judgment of Issues in Reorganized Debtors*
13 *Objection to Claim #2090 and Claimant's Response Thereto*).

14 K. On March 3, 2023, the Reorganized Debtors filed *PG&E's Opposition to Motion for*
15 *Partial Summary Judgment and Counter-Motion for Summary Judgment; Memorandum of Points and*
16 *Authorities* (the "**PG&E Motion**") [Docket No. 13567].

17 L. The Parties have conferred further regarding the briefing schedule related to the
18 Shahmirza Motion and the PG&E Motion and wish to modify the schedule as set forth below.

19
20 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, BY AND**
21 **BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES**
JOINTLY REQUEST THE BANKRUPTCY COURT TO ORDER, THAT:

22 1. Shahmirza shall file an opposition to the PG&E Motion and a reply in support of the
23 Shahmirza Motion on or before April 3, 2023.

24 2. The Reorganized Debtors shall file a reply in support of the PG&E Motion on or before
25 April 19, 2023.

26 3. A hearing on the Shahmirza Motion and PG&E Motion will be held on **May 9, 2023**, at
27 10:00 a.m. (Pacific Time).

28 4. The April 11, 2023 hearing on this matter is dropped from the calendar.

1 5. The Stipulation and any Order approving the terms of this Stipulation are without
2 prejudice to any Party requesting a further continuance of the hearing or otherwise modifying the briefing
3 schedule set forth herein.

4 6. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or controversies
5 arising from this Stipulation or any Order approving the terms of this Stipulation.

6 7. In the event that the terms of this Stipulation are not approved by the Bankruptcy Court,
7 it shall be null and void and have no force or effect.

8
9
10 Dated: March 17, 2023

11 KELLER BENVENUTTI KIM LLP
12 ROVENS & LAMB LLP
13 LAW OFFICES OF JENNIFER L. DODGE, INC.

COHEN AND JACOBSON, LLP

14 /s/ Thomas B. Rupp
15 Thomas B. Rupp
16 *Attorneys for Debtors and*
17 *Reorganized Debtors*

/s/ Lawrence A. Jacobson
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